

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

FRENKEL LAMBERT WEISS WEISMAN & GORDON, LLP
80 Main Street, Suite 460
West Orange, NJ 07052
973- 325-8800
File No.: 03-020848-B00
Douglas McDonough, Esq.
Attorney ID: DM0973
DMcDonough@flwlaw.com
Attorney for PennyMac Loan Services, LLC, Secured Creditor

In Re:

Sharlene L. Collins aka Sharlene Lee Collins
Debtor(s).

Case No.: **22-19596-JNP**

Chapter 13

Judge Jerrold N. Poslusny, Jr.

Hearing Date:

NOTICE OF MOTION TO APPROVE PARTIAL CLAIM LOAN MODIFICATION

TO: All Parties on the accompanying certification of service

PLEASE TAKE NOTICE that the undersigned attorneys for PennyMac Loan Services, LLC (the “Movant”) has filed papers with the United States Bankruptcy Court, 400 Cooper St., 4th Floor, Camden, NJ 08101, before the Honorable Jerrold N. Poslusny, Jr., seeking entry of an Order Approving a Loan Modification Agreement between Movant and the Debtor(s), relating to the real property commonly known as 6349 Harvey Ave. Pennsauken NJ 08109, currently owned by the Debtor(s) and made part of this bankruptcy.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

Any opposition to this motion must be filed no later than seven days before the return date of the motion. If no opposition is filed, the Bankruptcy Court may enter an Order Approving the Loan Modification Agreement without a hearing.

IN ACCORDANCE WITH THE LOCAL BANKRUPTCY RULES, NO HEARING WILL BE HELD UNLESS YOU FILE WRITTEN OPPOSITION IN ACCORDANCE WITH THE ABOVE PROCEDURES.

Movant asserts that the facts and law it relies upon in making this motion are neither complicated nor unique, and therefore no brief or legal memorandum is necessary pursuant to D.N.J. LBR 9013-2.

Movant further waives oral argument and relies upon the documentation of the within motion unless this matter is contested.

Dated: July 07, 2023

/s/ Douglas McDonough.

Douglas McDonough, Esq.